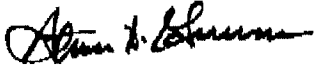


EXHIBIT A

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CLERK OF THE COURT

1 **COMP**

2 LAWRENCE J. SMITH (NSB 6505)
3 BENSON, BERTOLDO, BAKER & CARTER
4 7408 W. Sahara Avenue
5 Las Vegas, Nevada 89117
6 Telephone : (702) 228-2600
7 Facsimile : (702) 228-2333
8 E-mail : lawre3@bensonlawyers.com
9 Attorneys for Plaintiff

6 **DISTRICT COURT**

7 **CLARK COUNTY, NEVADA**

8 * * *

9 AISHA COOKS-PUTNAM, individually,

10 Plaintiff,

11 vs.

CASE NO. A- 15- 718473- C
DEPT NO.

V I I I

12 TRUMP LAS VEGAS CORP., a Nevada
13 corporation d/b/a Trump International Hotel &
14 Tower Las Vegas; TRUMP INTERNATIONAL
15 HOTEL & TOWER LAS VEGAS UNIT
16 OWNERS ASSOCIATION., a Nevada non-
17 profit corporation; TRUMP RUFFIN TOWER
18 I, LLC, a Delaware LLC d/b/a Trump
19 International Hotel & Tower Las Vegas;
20 TRUMP RUFFIN COMMERCIAL, LLC, a
21 Delaware LLC d/b/a Trump International Hotel
22 & Tower Las Vegas; OTIS ELEVATOR
23 COMPANY, a New Jersey corporation; DOES I
24 through XX, inclusive; and ROE BUSINESS
25 ENTITIES I through XX, inclusive,

26 Defendants

COMPLAINT

27 Plaintiff, AISHA COOKS-PUTNAM, by and through her counsel of record,
28 LAWRENCE J. SMITH of BENSON, BERTOLDO, BAKER & CARTER, CHTD. for her
claims of relief against the Defendants, and each of them, alleges and complains as follows:

I.

Plaintiff AISHA COOKS-PUTNAM was at all relevant times herein mentioned a
resident of the State of Illinois.

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II.

On information and belief, it is alleged that at all relevant times herein mentioned, Defendants TRUMP LAS VEGAS CORP., TRUMP RUFFIN COMMERCIAL, LLC, TRUMP RUFFIN TOWER I, LLC, and TRUMP INTERNATIONAL HOTEL & TOWER LAS VEGAS UNIT OWNERS' ASSOCIATION (hereinafter referred to as "TRUMP"), are all business entities regularly doing business in the State of Nevada.

III.

On information and belief, it is alleged that at all relevant times herein mentioned, Defendant OTIS ELEVATOR COMPANY (hereinafter referred to as "OTIS"), was a business entity regularly conducting business in the State of Nevada.

IV.

The true names and capacities of Defendants ROE BUSINESS ENTITIES I through XX, inclusive, and DOES I through XX, inclusive are unknown to Plaintiff, who, therefore, sues Defendants by these fictitious names. Defendants designated as DOES I through XX and/or ROE BUSINESS ENTITIES I through XX are owners, managers, agents, employees, assigns, contractors or subcontractors of TRUMP and/or OTIS, or individuals otherwise within possession and/or control of the business and premises herein alleged or otherwise responsible for the design, manufacture, installation, distribution, inspection and/or maintenance of the elevators at the TRUMP INTERNATIONAL HOTEL & TOWER. Plaintiff is informed, believes and thereon alleges that each of the Defendants designated as a ROE BUSINESS ENTITY or a DOE is in some manner negligently, vicariously, strictly, contractually and/or statutorily responsible for the manufacture, distribution, installation, maintenance and upkeep of the aforementioned elevators and their negligence, the failure to inspect and maintain the property's elevators in safe working condition, their design, distribution and manufacture of a defective product directly leading to the events and happenings referred to herein and causing damages directly and proximately to Plaintiff as herein alleged. Plaintiff will ask leave of the

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1 Court to amend her Complaint to insert the true names of such Defendants when the same have
2 been ascertained.

3 V.

4 At all times pertinent hereto, and particularly on or about May 17, 2013, Defendants
5 TRUMP and/or OTIS owned, occupied and maintained a business and premises commonly
6 known as TRUMP INTERNATIONAL HOTEL & TOWER at 2000 N. Fashion Show Drive,
7 Las Vegas, Nevada.

8 VI.

9 On information and belief, it is alleged that at all relevant times herein mentioned,
10 Defendants TRUMP and/or OTIS and/or ROE/DOE, and each of them, had a duty to maintain
11 the elevators at the business and premises commonly known as TRUMP TOWERS.

12 VII.

13 On or about May 17, 2013, Plaintiff AISHA COOKS-PUTNAM was on said premises
14 commonly known as TRUMP INTERNATIONAL HOTEL & TOWER as a business invitee.

15 VIII.

16 At such time and place, Defendants TRUMP and/or OTIS and/or ROE/DOE
17 Defendants, and/or their owners, agents, employees or assigns, and each of them, negligently,
18 carelessly and recklessly cared for said premises by manufacturing and/or distributing and/or
19 installing a defective elevator, failing to maintain the premises in a safe and reasonable
20 condition, permitting a hazardous condition to exist upon the property in a known traffic area for
21 patrons, in particular allowing the elevators to operate in such a manner as to allow said elevator
22 to drop rapidly over 50 feet before coming to an abrupt halt, a condition that Defendants knew or
23 should have known was inherently and unreasonably dangerous to these persons, and in
24 particular, Plaintiff.

25 IX.

26 At such time and place, Defendants TRUMP and/or OTIS, and/or, ROE/DOE
27 Defendants, and/or their owners, agents, employers, assigns or other, and each of them, failed to
28

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1 timely inspect for the existence of the hazard, and/or allowed the creation of, the elevator's
2 overly dangerous and unsafe condition, and these Defendants had actual or constructive notice of
3 its existence.

4 X.

5 At such time and place, Plaintiff had no knowledge of the latently dangerous and unsafe
6 condition existing on Defendant's business and premises, and in particular, the propensity for the
7 elevators to act in an unsafe and dangerous manner upon the business and premises, nor were
8 any warnings of said hazard posted to make individuals, including the Plaintiff, aware of said
9 hazard.

10 XI.

11 The failure of Defendants TRUMP and/or OTIS, and/or ROE/DOE Defendants, and/or
12 their owners, agents, employees, assigns or other, and each of them, to correct, inspect, remove
13 or warn persons of the aforesaid dangerous and unsafe condition, or give adequate warning of the
14 foreseeable risk of harm posed thereby, was a breach of the duty of reasonable care owed by the
15 Defendants under the circumstances to foreseeable persons who entered the premises, and in
16 particular, to Plaintiff.

17 XII.

18 As a direct and proximate result of Defendants TRUMP and/or OTIS, and/or,
19 ROE/DOE Defendants, and/or its owners, agents, employees or assigns, and each of them,
20 breached their duty of reasonable care owed to Plaintiff through their negligence, carelessness
21 and recklessness, the elevator which Plaintiff was using fell rapidly before stopping abruptly,
22 trapping Plaintiff within said elevator for several hours, causing Plaintiff personal injuries and
23 emotional distress.

24 XIII.

25 As a direct and proximate result of the aforesaid breach of the duty of reasonable care
26 through their negligence, carelessness and recklessness by Defendants TRUMP and/or OTIS,
27 and/or ROE/DOE Defendants, and/or their owners, agents, employees or assigns, and each of
28

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1 them, Plaintiff was injured in her health, strength and activity, sustaining shock and injury to her
2 body, nervous system and person, all of which have caused, and will continue to cause, the
3 Plaintiff physical, mental and nervous pain and suffering and loss of enjoyment of life.

4 XIV.

5 On information and belief it is alleged that Defendant OTIS and/or ROE/DOE
6 Defendants, and/or their owners, agents, employees or assigns, and each of them, designed,
7 manufactured and/or distributed said elevator system which was installed in TRUMP
8 INTERNATIONAL HOTEL & TOWER.

9 XV.

10 It is alleged that said elevator system designed, manufactured and/or distributed to
11 TRUMP INTERNATIONAL HOTEL & TOWER was defective in its design as the elevator did
12 not operate in such a manner as to be expected by a reasonable consumer, to wit, falling
13 numerous floors at a high rate of speed and abruptly stopping, and said design defect existed at
14 the time the product was distributed to TRUMP INTERNATIONAL HOTEL & TOWER.

15 XVI.

16 It is alleged that said elevator system designed, manufactured and/or distributed to
17 TRUMP INTERNATIONAL HOTEL & TOWER was defective in its manufacture as the
18 elevator did not operate in such a manner as to be expected by a reasonable consumer, to wit,
19 falling numerous floors at a high rate of speed and abruptly stopping, and said manufacturing
20 defect existed at the time the product was distributed to TRUMP INTERNATIONAL HOTEL &
21 TOWER.

22 XVII.

23 It is alleged said elevator system designed, manufactured and/or distributed to the
24 TRUMP INTERNATIONAL HOTEL & TOWER was defective as the elevator did not operate
25 in such a manner as to be expected by a reasonable consumer, to wit, falling numerous floors at a
26 high rate of speed and abruptly stopping, that no warnings were given to the Plaintiff relative to
27
28

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1 this hazard, and that said defect, including a lack of warnings, existed at the time the product was
2 distributed to TRUMP INTERNATIONAL HOTEL & TOWER.

3 XVIII.

4 As a direct and proximate result of the design, manufacture and distribution of said
5 defective product OTIS, and/or ROE/DOE Defendants, and/or their owners, agents, employees
6 or assigns, and each of them, Plaintiff has incurred and continues to incur medical expenses, loss
7 of income, possible future medical expenses and economic losses, and loss of enjoyment of life,
8 all to Plaintiff's general damages in an amount in excess of TEN THOUSAND DOLLARS
9 (\$10,000).

10 WHEREFORE, Plaintiff prays for judgment against the Defendants as follows:

- 11 1. For general damages and loss in an amount in excess of TEN THOUSAND
12 DOLLARS (\$10,000.00);
13 2. For special damages in an amount to be determined at time of trial;
14 3. For loss of income in an amount as yet undetermined;
15 4. For reasonable attorneys fees, pre- and post-judgment interest, and costs of
16 suit; and
17 5. For such other and further relief as the Court may deem just and proper.

18 DATED: May 15, 2015

BENSON, BERTOLDO, BAKER & CARTER

19
20 By: 

21 LAWRENCE J. SMITH (NSB 6505)
22 7408 W. Sahara Avenue
23 Las Vegas, Nevada 89117
24 Telephone : (702) 228-2600
25 Facsimile : (702) 228-2333
26 e-mail : lawre3@bensonalawyers.com
27 Attorneys for Plaintiff
28

BENSON BERTOLDO BAKER & CARTER, CHTD.

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IAFD

LAWRENCE J. SMITH (NSB 6505)
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Las Vegas, Nevada 89117
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Facsimile : (702) 228-2333
E-mail : lawre3@bensonlawyers.com
Attorneys for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

AISHA COOKS-PUTNAM, individually,
Plaintiff,

CASE NO.
DEPT NO.

vs.

INITIAL APPEARANCE
FEE DISCLOSURE

TRUMP LAS VEGAS CORP., a Nevada
corporation d/b/a Trump International Hotel &
Tower Las Vegas; TRUMP INTERNATIONAL
HOTEL & TOWER LAS VEGAS UNIT
OWNERS ASSOCIATION., et al.

Defendants

Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are submitted
for parties appearing in this matter as indicated below:

AISHA COOKS-PUTNAM \$270.00

TOTAL REMITTED: \$270.00

DATED: May 15, 2015

BENSON, BERTOLDO, BAKER & CARTER

By:

LAWRENCE J. SMITH (NSB 6505)
7408 W. Sahara Avenue
Las Vegas, Nevada 89117
Telephone : (702) 228-2600
Facsimile : (702) 228-2333
e-mail : lawre3@bensonlawyers.com
Attorneys for Plaintiff

SUMM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

AISHA COOKS-PUTNAM, individually,
Plaintiff,
vs.
TRUMP LAS VEGAS CORP., et al.
Defendants

CASE NO. A-15-718473-C
DEPT NO. VIII

SUMMONS

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.


TRUMP RUFFIN TOWER I LLC
c/o National Registered Agents, Inc. of NV, Resident Agent
311 S. Division Street
Carson City, NV 89703
(or at most current address)

TO THE DEFENDANT(S): A civil complaint has been filed by the Plaintiff(s) against you for the relief set forth in the Complaint. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following: (a) file with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee; and (b) Serve a copy of your response upon the attorney whose name and address is shown below. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint. If you intend to see the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislatures each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.


Submitted by:

CLERK OF COURT

BENSON BERTOLDO BAKER & CARTER

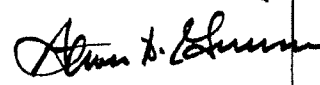
 4522

LAWRENCE J. SMITH
Nevada Bar No. 6505
7408 W. Sahara Avenue
Las Vegas, Nevada 89117
Telephone (702) 228-2600

By:  **KADIRA BECKOM**

Deputy Clerk
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155
DATE 2015

NOTE: When service is by publication, add a brief statement of the object of the action. See Nevada Rules of Civil Procedure 4(b).

Attorney or Party without Attorney: LAWRENCE J. SMITH NBN 6505 BENSON, BERTOLDO, BAKER & CARTER, CHTD. 7408 WEST SAHARA AVENUE LAS VEGAS, NV 89117 Telephone No: 702-228-2600 FAX No: 702-228-2333				For Court Use Only Electronically Filed 06/03/2015 10:49:50 AM  CLERK OF THE COURT	
Attorney for: Plaintiff				Ref. No. or File No.:	
Insert name of Court, and Judicial District and Branch Court: EIGHTH JUDICIAL DISTRICT COURT, CLARK COUNTY, NEVADA					
Plaintiff: AISHA COOKS-PUTNAM Defendant: TRUMP LAS VEGAS CORP.					
AFFIDAVIT OF SERVICE		Hearing Date:	Time:	Dept/Div:	Case Number: A-15-718473-C

1. At the time of service I was at least 18 years of age and not a party to this action.

2. I served copies of the SUMMONS; COMPLAINT

3. a. Party served: TRUMP RUFFIN TOWER I LLC
 b. Person served: LINDA ROBERTSON, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

4. Address where the party was served: NATIONAL REGISTERED AGENTS, INC. OF NV
 311 S. DIVISION ST.
 CARSON CITY, NV 89703

5. I served the party:
 a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Fri., May. 29, 2015 (2) at: 1:15PM

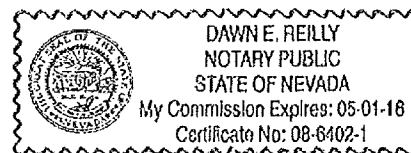
7. Person Who Served Papers:
 a. TONI L. RUCKMAN (R-052005)
 b. FIRST LEGAL INVESTIGATIONS
 NEVADA PI/PS LICENSE 1452
 704 S. 6TH STREET
 LAS VEGAS, NV 89101
 c. (702) 671-4002

Fee for Service:

I Declare under penalty of perjury under the laws of the State of NEVADA that the foregoing is true and correct.

June 15
 (Date)

Toni L. Ruckman
 (Signature)



8. STATE OF NEVADA, COUNTY OF Clark
 Subscribed and sworn to (or affirmed) before me on this June 15 day of June 15 by TONI L. RUCKMAN (R-0526)
 proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Mon, Jun. 01, 2015

AFFIDAVIT OF SERVICE

(Notary Signature)

8759600 .benson.705084

SUMM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

AISHA COOKS-PUTNAM, individually,
Plaintiff,
vs.
TRUMP LAS VEGAS CORP., et al.
Defendants

CASE NO. A-15-718473-C
DEPT NO. VIII

SUMMONS

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TRUMP LAS VEGAS CORP.
c/o National Registered Agents, Inc. of NV, Resident Agent
311 S. Division Street
Carson City, NV 89703
(or at most current address)

TO THE DEFENDANT(S): A civil complaint has been filed by the Plaintiff(s) against you for the relief set forth in the Complaint. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following: (a) file with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee; and (b) Serve a copy of your response upon the attorney whose name and address is shown below. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint. If you intend to see the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislatures each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.

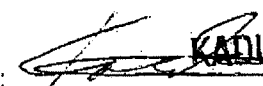
Submitted by:

CLERK OF COURT

BENSON BERTOLDO BAKER & CARTER

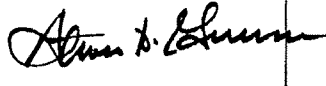
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LAWRENCE J. SMITH
Nevada Bar No. 6505
7408 W. Sahara Avenue
Las Vegas, Nevada 89117
Telephone (702) 228-2600

By:  **KADIRA BECKOM**

Deputy Clerk
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155
MAY 26 2015
DATE

NOTE: When service is by publication, add a brief statement of the object of the action. See Nevada Rules of Civil Procedure 4(b).

Attorney or Party without Attorney: LAWRENCE J. SMITH NBN 6505 BENSON, BERTOLDO, BAKER & CARTER, CHTD. 7408 WEST SAHARA AVENUE LAS VEGAS, NV 89117 Telephone No: 702-228-2600 FAX No: 702-228-2333				For Court Use Only Electronically Filed 06/03/2015 09:42:27 AM  CLERK OF THE COURT	
Attorney for: Plaintiff		Ref. No. or File No.:			
Insert name of Court, and Judicial District and Branch Court: EIGHTH JUDICIAL DISTRICT COURT, CLARK COUNTY, NEVADA					
Plaintiff: AISHA COOKS-PUTNAM Defendant: TRUMP LAS VEGAS CORP.					
AFFIDAVIT OF SERVICE		Hearing Date:	Time:	Dept/Div:	Case Number: A-15-718473-C

1. At the time of service I was at least 18 years of age and not a party to this action.

2. I served copies of the SUMMONS; COMPLAINT

3. a. Party served: TRUMP LAS VEGAS CORP.
 b. Person served: LINDA ROBERTSON, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

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 311 S. DIVISION ST.
 CARSON CITY, NV 89703

5. I served the party:
 a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Fri., May. 29, 2015 (2) at: 1:15PM

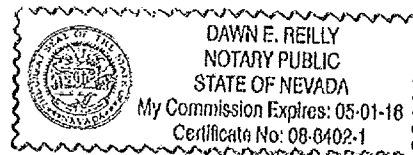
7. Person Who Served Papers:
 a. TONI L. RUCKMAN (R-052005)
 b. FIRST LEGAL INVESTIGATIONS
 NEVADA PI/PS LICENSE 1452
 704 S. 6TH STREET
 LAS VEGAS, NV 89101
 c. (702) 671-4002

Fee for Service:

I Declare under penalty of perjury under the laws of the State of NEVADA that the foregoing is true and correct.

June 15
 (Date)



 (Signature)



8. STATE OF NEVADA, COUNTY OF Clark
 Subscribed and sworn to (or affirmed) before me on this 1 day of June 15 by TONI L. RUCKMAN (R-052005)
 proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Mon, Jun. 01, 2015

AFFIDAVIT OF SERVICE

(Notary Signature) 
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